

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NORTH DAKOTA

UNITED STATES OF AMERICA

v.

JUSTIN LADD SPOTTED BEAR

INDICTMENT

Case No. _____

Violations: 18 U.S.C. §§ 2244(a)(5),
2244(b), and 1153

COUNT ONE

Abusive Sexual Contact of a Child

The Grand Jury Charges:

From in or about 2018 to in or about 2019, in Indian country, and within the exclusive jurisdiction of the United States,

JUSTIN LADD SPOTTED BEAR,

an Indian, knowingly engaged in and caused sexual contact, that is, the intentional touching, directly and through the clothing, of the genitalia, anus, groin, buttocks, and inner thigh of H.R. (YOB 2008), an Indian child under 12 years of age, with an intent to abuse, humiliate, harass, degrade, and arouse and gratify the sexual desire of any person;

In violation of Title 18, United States Code, Sections 2244(a)(5) and 1153.

COUNT TWO

Abusive Sexual Contact

The Grand Jury Further Charges:

From in or about August 2019 to in or about December 2019, in Indian country,
and within the exclusive jurisdiction of the United States,

JUSTIN LADD SPOTTED BEAR,

an Indian, knowingly engaged in and caused sexual contact, that is, the intentional
touching, directly and through the clothing, of the buttocks of C.H., with an intent to
abuse, humiliate, harass, degrade, and arouse and gratify the sexual desire of any person;

In violation of Title 18, United States Code, Sections 2244(b) and 1153.

A TRUE BILL:

/s/ Foreperson
Foreperson

/s/ Nicholas W. Chase
NICHOLAS W. CHASE
Acting United States Attorney

EBL/tmg